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Joe Hand Promotions, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOE HAND PROMOTIONS, INC., a
Pennsylvania corporation,

Plaintiff,

v.

RB Properties, Inc., a Nevada corporation,
d/b/a OLD TOWN SALOON; ROBERT P.
BILBRAY, an individual,

Defendants.

Case No.: 2:20-cv-01549-JAD-EJY

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

The parties hereto, through their respective counsel, hereby submit the following proposed Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 26-1.

1. Conference. Pursuant to Federal Rule of Civil Procedure 26(f), counsel for the parties conferred telephonically on June 8, 2021. As required, during this conference counsel considered the nature and basis of their clients' claims and defenses and the possibility of prompt settlement of this action. Counsel discussed the timing and other arrangements pertaining to the initial disclosures required by Rule 26(a)(1), discussed issues concerning preservation of discoverable information and developed a proposed discovery plan.

2. Discovery Plan:

A. Initial Disclosures: Pursuant to Rule 26(a)(1)(C), and by agreement of the

1 parties, the parties will exchange initial disclosures no later than June 15, 2021.

2 B. Areas of Discovery: Discovery will be needed to address all issues,
3 including all claims and defenses within the scope of the parties' pleadings.

4 C. Discovery Cut-Off Date: The parties propose a discovery cut-off date of
5 October 13, 2021, which is one hundred and twenty (120) days following the
6 parties' proposed deadline for serving initial disclosures.

7 D. Amendments to Pleadings and Addition of Parties: Pursuant to Local Rule
8 26.1(e)(2), the parties shall have until July 15, 2021 to file any motions to amend
9 pleadings or to add parties. This date is ninety (90) days before the parties'
10 proposed discovery cut-off date.

11 E. Federal Rule of Civil Procedure 26(a)(2) Expert Disclosures: Disclosure of
12 experts shall be made no later than August 16, 2021, which is the next closest day
13 to sixty (60) days before the parties' proposed discovery cut-off date. Disclosures
14 of any rebuttal experts shall be made no later than September 15, 2021, which is
15 within thirty (30) days after the parties' initial disclosure of experts.

16 F. ~~Interim Status Report: Pursuant to Local Rule 26-3, the parties shall submit~~
17 ~~an interim status report no later than August 16, 2021, which is the next closest~~
18 ~~day to sixty (60) days before the parties' proposed discovery cut-off date.~~

19 G. Dispositive Motions: Pursuant to Local Rule 26-1(e)(4), the parties shall
20 have until November 12, 2021 to file dispositive motions. The date is thirty (30)
21 days after the parties' proposed discovery cut-off date.

22 H. Pretrial Order: Pursuant to Local Rule 26-1(e)(5), the joint pretrial order
23 shall be filed by December 13, 2021. This date is the next closest day to thirty (30)
24 days after the deadline for filing dispositive motions. In the event that dispositive
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1 motions are filed, the date for filing the joint pretrial order shall be suspended until
2 thirty (30) days after the decision on such motion(s) or further order of the Court.
3 The disclosures required by Federal Rule of Civil Procedure 26(a)(3), and any
4 objections thereto, shall be made in the joint pretrial order.
5

6 **3. Limitations on Discovery:** At this time, the parties proposed no changes to the form
7 or scope of discovery imposed by the Federal Rules of Civil Procedure or the Local
8 Rules, other than the extension of certain deadlines as noted above. The parties,
9 however, reserve their right to seek changes the limitations on the form or scope of
10 discovery, as and if necessary, at a later date.

11 **4. Court Conference:** The parties do not believe that a conference is necessary, unless
12 the Court feels it would be useful to hear from the parties with respect to their proposed
13 scheduling plan.
14

15 DATED: June 8, 2021

16 **JEKIELEK & JANIS LLP**

**THORDNDAL ARMSTRONG DELK
BALKENBUSH & EISINGER**

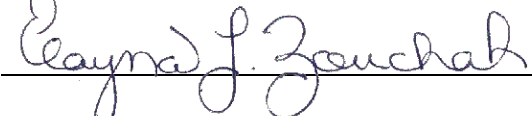
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21 Attorneys for Plaintiff

Attorneys for Defendants

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23 IT IS SO ORDERED

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UNITED STATES MAGISTRATE JUDGE

26 DATED: June 8, 2021
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